

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-80144-CR-Smith/Maynard(s)

UNITED STATES OF AMERICA

v.

JOFF STENN WROY PHILOSSAINT,
MARIEL TOLLINCHI,
REGINE MARIE RENE,
BRIANNA MONIQUE GAYLE,
and MAURICE SHAZIER,

Defendants.

**GOVERNMENT'S NOTICE OF INTENT TO OFFER RECORDS
OF REGULARLY CONDUCTED ACTIVITY BY CERTIFICATION**

The United States respectfully notifies the defense that it intends to introduce domestic records of regularly conducted activity that meet the requirements of Federal Rule of Criminal Procedure 803(6)(A)-(C), as shown by a certification of a custodian or another qualified person that complies with Federal Rules of Criminal Procedure 803(6)(D) and 902(11).

The records to be introduced and the corresponding certifications are as follows:

How disclosed [*]	Records		Certification	
	Location of records	Records of	File name [†]	p. [‡]
HD	\Subpoena returns\008_NavyFederal	Navy Federal Credit Union	Cover Letter & Certification.pdf	2
HD	\Subpoena returns\002_WellsFargo	Wells Fargo	Part 1 of 2\RecordsDelivered_Doc_ID_16488356_2.pdf	
HD	\Subpoena returns\001_ADP	ADP	ADP 1\Certification.pdf	
HD	\Subpoena returns\020_GMAIL\GMAIL Production	Google	Letter 20424683.pdf	3-13
HD	\Subpoena returns\026_AT&T	AT&T	Declaration.pdf	
USAfx	\221108\036_CHASE	JP Morgan Chase	SB1357534-F1_SCD_1.PDF	1
USAfx	\221108\037_BOA	Bank of America	D082422000819 Declaration esig.pdf	
USAfx	\221108038_WF.pdf	Wells Fargo		1
USAfx	\22110839 NFCU.pdf	Navy Federal Credit Union		1-3
USAfx	\221108\040_Wells Fargo	Wells Fargo	RecordsDelivered_Doc_ID_17313870_2.pdf	
USAfx	\221108\041_SpaceCoast	Space Coast Credit Union	CERTIFICATION.pdf	
USAfx	\221108\042_AMERITRADE	Ameritrade	TDA Declaration of Custodian of Records 09.15.2022.pdf	
USAfx	\221108\47 Chase	JP Morgan Chase	SB1367824-F1_SCD_1.PDF	1
USAfx	\221108\051_TD BANK	TD Bank	Records Cert.pdf	
USAfx	\221108\052_TMOBILE	T-Mobile	4026272_20220927_Certification.pdf	
USAfx	\22110854_Verizon.zip	Verizon	certificate.pdf	

^{*} 'HD' refers to the hard drive provided to all defense counsel at the beginning of the case, as discussed in the government's response to the standing discovery order. The government has disclosed additional discovery by USAfx, the government's file-share program.

[†] If the file name is blank, the certification is found in the same file that also contains the records. If a filename is given, then, except where indicated, the file containing the certification is found inside the folder that also contains the records.

[‡] If the page number is blank, the entire file constitutes the certification.

How disclosed [†]	Records		Certification	
	Location of records	Records of	File name [†]	p. [‡]
USAfx	\221110\007_PNC	PNC	007_PNC certification.pdf	
USAfx	\221110\014_Chase.zip	JP Morgan Chase	\HD\Subpoena returns\014_ChaseBank\ChaseSubpoenaReturn(June7).PDF [§]	2
USAfx	\221110\015_SYNOVUS.zip	Synovus	SYNOVUS_ALLproduction\SYNOVUS Final Production Part 3 July 6\SynovusFinalJuly6\Certification-Mariel Tollinchi et al-S22-0460.pdf	
USAfx	\221110\018_POPULAR.zip	Popular Bank	Popular Bank Subpoena Return July 11\S20220623-3-GR\POPULARBank_SUBReturn1.pdf	9
USAfx	\221110\028_WellsFargo.zip	Wells Fargo	RecordsDelivered_Doc_ID_17206104_2.pdf	
USAfx	\221112\Clear Shot Entertainment Itria PPP	Itria	Certificate of Authenticity- Clear Shot Entertainment LLC.pdf	

WHEREFORE, the government respectfully notifies the defense that it intends to introduce records of regularly conducted activity by certification.

Respectfully submitted,

JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY

By: s/ Marc Osborne
Assistant United States Attorney
Court ID# A5500796
500 S. Australian Avenue, Suite 400
West Palm Beach, Florida 33401
Tel: (561) 209-1014
marc.osborne@usdoj.gov

[§] These records were disclosed through USAfx, but the certification had already been disclosed on the discovery hard drive.